



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

January 17, 2020

Marianne Barbino Dubuque, Esq.
Carmody Torrance Sandak Hennessey LLP
50 Leavenworth Street
P.O. Box 1110
Waterbury, CT 06702

RE: **PETITION NO. 1310A** - Quinebaug Solar, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 50 megawatt AC solar photovoltaic electric generating facility on approximately 561 acres comprised of 29 separate and abutting privately-owned parcels located generally north of Wauregan Road in Canterbury and south of Rukstela Road and Allen Hill Road in Brooklyn, Connecticut. Reopening of this petition based on changed conditions pursuant to Connecticut General Statutes §4-181a(b).

Dear Attorney Dubuque:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than January 28, 2020. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as a copy via electronic mail. In accordance with the State Solid Waste Management Plan, the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the January 28, 2020 deadline.

Copies of your responses shall be provided to all parties and intervenors listed on the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

Melanie A. Bachman
Executive Director

MB/MP

c: Parties and Intervenors

**Petition No. 1310A
Interrogatories
Set One
January 17, 2020**

General Project Questions

1. Referencing page 3-1 of Quinebaug Solar, LLC's (Quinebaug) November 12, 2019 Petition, Eversource is purchasing 40.18% of the Project output via the Power Purchase Agreement (PPA). Is this correct?
2. Referencing page 8 of Eversource's Pre-filed Testimony, Eversource indicates that its environmental review was based on information provided by Quinebaug and Eversource. To what extent did Eversource evaluate the proposed switching station property to determine potential environmental effects? Provide detail.

Canterbury Switching Station and associated Transmission Connections Questions

3. What type of material would be installed on the inside of the fence at Canterbury Switching Station?
4. Referencing page 6 of Eversource's Pre-filed Testimony, Eversource proposes two single-circuit weathering steel structures. Would these two proposed single circuit steel structures be direct-embed, or would they have foundations?
5. Referencing page 6 of Eversource's Pre-filed Testimony, the #1607 Line would be split into two lines: the #1132 Line and the #1316 Line. If one of these two lines is out of service, could the other line continue to support Canterbury Switching Station and thus keep Quinebaug solar facility in service?
6. Referencing page 9 of Eversource's Pre-filed Testimony, it states, "The closest residence is approximately 1,000 feet from the proposed switching station and tap structures." What direction (e.g. N, S, E, W) is the closest residence from the proposed switching station area?
7. Are there any protective measures necessary for the New England Cottontail Focus areas in the vicinity of Canterbury Switching Station?

Transmission Upgrades in Norwich Questions

8. Referencing page 11 of Eversource's Pre-filed Testimony, with the simultaneous interruption of both the #1000 and #1080 circuits, where would the thermal overloads occur? Explain.
9. Referencing page 14 of Eversource's Pre-filed Testimony, it states, "This work area is not located within or proximate to FEMA 100-year flood zones." Would any of the 10 new single-circuit monopoles be located within the 500-year flood zone?
10. Referencing Page 17 of Eversource's Pre-filed Testimony, it states, "[T]he existing vegetation management corridor would be expanded by 35 to 55 feet from a typical width of 50 to 70 feet to a width of approximately 105 feet, resulting in the removal of trees along the length of the ROW segment." Estimate the total tree clearing area in acres.

11. Referencing Map Sheets 1 and 2, the existing double-circuit configuration is identified as “1080/1675 Line.” Please explain why one of the lines is identified as the #1675 Line while the proposal is to separate the #1080 and #1000 Lines? Please submit corrected sheet(s) if necessary.
12. Referencing page 26 of Eversource’s Pre-filed Testimony, it states, “The primary source of electric and magnetic fields are the transmission lines. The electric and magnetic fields in the vicinity of the proposed Canterbury Switching Station would increase in the area beneath where the lines enter and interconnect to the station...Away from the point of the interconnection, the changes to the fields would be negligible.” Even with the presence of Quinebaug’s Substation immediately north of Eversource’s Canterbury Switching Station, would the primary source of electric and magnetic fields still be the transmission lines?
13. Referencing Exhibit O of Quinebaug’s Petition, Quinebaug performed an Acoustic Analysis taking into account its inverter/transformer pairs (at the solar array portion of the site) and the Quinebaug Substation generator step-up transformer (GSU). Would the addition of Eversource’s Canterbury Switching Station increase noise levels at the property boundaries? Explain.